

) Comments regarding RM-10740 now before the Commission by Larry Robison.
) Larry Robison has held an Amateur EXTRA Class license for 31 years and has been a licensed radio amateur for 45 years.
) Larry Robison holds a General Class Radiotelephone commercial license and has held a commercial license (First Class Radiotelephone) for 40 years.

1) Please consider first, that this petition is being filed using the justification that the crowding of signals demands the restriction of bandwidth in the amateur service. I would suggest that this is not true and while it points to a problem, the need is "other" relief, namely the reapportionment of the sub bands, that unfairly limits the majority of the activity in the amateur service to only half of the available spectrum (below 29.7 mhz) that is allocated to the service.

In the early days of the amateur service, allocation of spectrum space was fairly simple. You were either using "phone" or "CW" and the amateur bands were divided into sub bands 50-50 accordingly. This was done because there were a fairly equal number of amateurs using each mode and it was desired to keep the modes separate for purposes of reduced interference to each other.

That is not true today as the lion share of operations are "phone" and yet the bands are still divided on the basis of 50-50 (approximately). This has resulted in the poor utilization of spectrum space allocated to "CW" and overcrowding of the portion allocated to "phone" operations. I contend that this is the true reason for the frustrations that has given rise to this petition and complaints regarding bandwidth. Trying to restrict the bandwidth of the transmitted signals by a few khz is unreasonable compared to the hundreds of khz of spectrum space that lies underutilized because of outdated allocation by the FCC.

2) Amateur Radio has long been the proving grounds for modes and types of communications used by other services. The rules for the Amateur service, Part 97, are broad by design so that amateurs are free to experiment without the restrictions normally imposed on other services. Amateur operators are required by the Commission to undergo testing that helps insure understanding of the rules and places the responsibility for technical operation directly on the individual operator. The adoption of any set of guidelines as proposed in RM-10740 would unduly restrict one of the basic purposes of this service.

3) Consider also that a large number of the radio equipment in use today in the amateur service is incapable of meeting such strict requirements without modification. All but the latest digital technology falls short. Certainly home built transmitting equipment would become a thing of the past due to the complexity of the measurement of such bandwidth to ensure compliance. Certainly older amateur radio equipment falls into this same category for the same reasons.

4) Implementation of these restrictions then also places additional burden on the FCC enforcement division to see that these rules are followed. The measurement of signals would be difficult for the Commission also and would require additional manpower and equipment to assure compliance for what would surely become an ocean of complaints.

5) Please also consider that the basis of the request is founded on complaints that assume that the problem is with the sending stations equipment. This may not necessarily be the case as problems with the petitioners "complaintants" own equipment may be at fault.

6) Further it has been mentioned that the 2.8 khz restriction, imposed on the recent allocation of the 5 channels in the 60 meter band, are proof that the restriction is valid and works. All that that allocation proves is that experimentation, one of the basic blocks in the foundation of the amateur service, is impossible on the newly allocated 60 meter band, and can only be used by the amateur service for experiments dealing with propagation for that specific band. The restriction does not prevent "communication" only reasonable "experimentation" and severely cripples the usefulness of the band.

6) Please consider further that the Petitioners are the major part of a small conspiracy to unnecessarily restrict the bandwidth allowed under the present rules governing the Amateur Radio Service, Part 97, "for their own purposes" and not a general consensus of licensed amateur radio operators. Information obtained under the "Freedom of Information Act", from the FCC's own Enforcement Division, reveals that these two petitioners were the top two contributors (five contributors total) to a series of complaints filed, that resulted in Advisory Notices being sent to amateurs that were experimenting with modes that the petitioners personally feel should not be allowed. That action by the FCC enforcement division was also ill advised for these very same reasons and gave petitioners further justification for their petition.

It would be reasonable to dismiss this petition in its entirety and without further consideration and I ask passionately, for the sake of the hobby, that you do so.